



## **MOTOR M2K Project Public Engagement QUESTIONS, CONCERNS**

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This is the Forest Service's initial responses to some of the main concerns and questions raised during the July 11, 2019 MOTOR M2K Public Engagement Session and subsequent conversations with interested parties. Responses will evolve as we receive additional feedback and continue to develop a proposed action.

**Concern:** The project timeline is too short to provide meaningful collaboration or public involvement. Other major efforts including the Sierra National Forest Plan Revision, and the proposed changes to the Forest Service NEPA Regulations that overlap with key MOTOR M2K public involvement stages. There is not enough time to allow the collaborative process to work/not in line with how collaboratives work. This is not the right way to do collaboration/feels like forced collaboration.

**Response:** The timeline for MOTOR M2K reflects a real sense of urgency for Forest Service to address the threats from wildfire, drought, insect and disease related mortality as outlined in the project need for action. We have; however, extended the project development phase to allow additional time for collaboration as well as delay the start of project scoping until after comments on the Sierra's Revised Forest Plan has closed. MOTOR M2K will also have an Implementation Plan (to be developed) which will specify the rule set for implementation including the public participation process post-NEPA decision. We are hoping our collaborators will help us develop a process that will provide for meaningful collaboration while maintaining our desired timeline.

The project development phase is one place where stakeholders can be involved, but there are also other points provided through the NEPA process: During the scoping comment period stake holders can comment on the proposed action and raise concerns and provide recommendations to improve the project. Then the proposed action is refined, and alternatives are generated based on issues raised during this period. Another opportunity to comment is on the Draft EIS (or Draft EA) during which the deciding officials consider the alternatives and reasons to select a one based on comments; an objection period after the FEIS and Draft decision is released which is followed by an objection resolution period during which stakeholders and other public have the opportunity to influence the final decision.

**Concern:** With a NEPA decision that covers almost the entirety of both forests there will be no meaningful way for the public to have a say in what vegetation management activities occur for the next 10-15 years.

**Response:** The MOTOR M2K decision will include an Implementation Guide which will include the process for post-decision public involvement. One discussion topic for the August 12<sup>th</sup> meeting will be identifying what this process could look like. Potential options could include annual implementation area prioritization meetings where the Forests utilize the prioritization process developed for the Potential Operational Delineation units (PODs), to determine the next landscape area(s) under the MOTOR M2K Implementation Guide. The Forest Service is also considering a hard check-in after 5 years where certain preidentified criteria would have to be met before additional categories of treatments or

area could be implemented. Stakeholders may help develop criteria that could help remove some uncertainty.

**Question:** How Does MOTOR M2K fit in with Sierra NF Forest Plan Revision (final decision from plan revision not expected until March 2021)?

**Response:** While MOTOR M2K will conduct one environmental analysis, each forest will issue a separate decision covering their respective forest. The Sierra NF is currently considering delaying issuance of a MOTOR M2K decision until after their revised Forest Plan is approved. The SNF Revised Forest Plan Final EIS and Draft Decision are expected to be released in March of 2020 prior to the release of the MOTOR M2K Draft environmental analysis. This analysis would include consideration of alternatives to ensure a final decision is within the scope analyzed and disclosed in the environmental analysis.

**Question:** How will this project actually improve the pace and scale of restoration treatments A lot of projects with current completed NEPA have yet to be fully implemented. Other factors such as lack of personnel, lack of funding and lack of burn windows seem to be the real barriers to increasing pace and scale.

**Response:** There are two different concerns: one is related to a lack of resources (funding and personnel); and one is related to how the project is designed. Related to needed resources, we realize that Forest Service budgets have been and may continue to be flat. However, there are increasing opportunities for grant opportunities, as well as agreements with partners that increase our capacity beyond what we can do alone. Projects with completed NEPA make them much more competitive during the grant application process (and is sometimes a requirement) as does having projects developed collaboratively with many different partners. This also includes bringing in implementation help from adjoining agencies/cooperators and USFS units and conducting all-lands (or cross boundary) project implementation. A continuing need to plan additional areas for primary and maintenance treatments exists to address fire risk and forest health related issues regardless of whether it is an implementation phase post-decision, or from separate NEPA efforts.

With regard to project design, MOTOR M2K will continue to build on the efforts undertaken in previous NEPA decisions in various stages of implementation. Most of the increase in annual acres treated will come from applying fire to a larger proportion of the landscape as part of maintenance or initial treatment. The implementation strategy of MOTOR M2K project will focus on using mechanical or hand treatments, setting the landscape up for large landscape burning (1,000s to 10,000s of acre burn units) or the management of naturally ignited wildfire for resource benefit. This will include the addition of areas adjacent to past treatments to create more comprehensive burn blocks. The location of control lines, fuel modification areas and landscape treatments would be developed for this end state in mind, with barriers to implementation identified and worked out in advance. Adaptive implementation and monitoring will allow for project level adjustments so that changes in vegetation due to disturbances.

**Question:** How will you ensure other priority work and follow up treatments will get done after the commercial timber removal is complete?

**Response:** We believe that once we have NEPA completed and a comprehensive plan in place, we will be more competitive for grants, or additional funding from the Forest Service's annual appropriations. Additionally, we are looking for suggestions from stakeholders as we develop the rule sets for the

implementation plan. Potential implementation monitoring could feed back the degree to which treatments have been implemented to meet desired conditions within

**Question:** The MOTOR M2K project is putting all its eggs in one basket. What happens if it gets litigated or falls through?

**Response:** As noted by several stakeholders, the Forest Service has projects with completed or nearly completed NEPA that has yet to be completed. There is likely enough mechanical treatments (thinning, salvage or other fuel treatments) to last 1-2 years. If MOTOR M2K were held up, the Forest Service could continue to work through the issues, delaying implementation until it has been resolved. An option that was raised at the first public engagement session was to simultaneously utilize an existing categorical exclusion. This is a viable option but would be limited in the extent of the treatments that could be authorized and would also reduce public participation. We do not have current capacity to take on additional NEPA at this time, however, the MOTOR M2K analysis could potentially be modified and utilized to produce a Decision Memo for implementation if MOTOR M2K is set aside.

**Question:** MOTOR is focused on resilience, but what if there are more large high-severity fires and resilience becomes a moot point across much of the landscape? What happens if the focus shifts from resilience to recovery?

**Response:** It is highly likely that we will get one or more large, high severity wildfires within the planning area within the next 10-15 years. This is why it is important incorporate flexibility and a condition-based response with this NEPA decision. The intent is that we develop rule sets, sideboards and an implementation plan and treatment prescriptions for when these fires occurs. One of the topics to be discussed at the August 12<sup>th</sup> Public Engagement Session includes whether or not we should include salvage logging, and if so, under what scenarios or conditions.

**Question:** How can you adequately disclose effects if the NEPA is condition-based and not site specific? There doesn't appear to be any successful examples of large landscape and/or condition-based NEPA projects. Many of the examples listed have issues and have yet to be implemented.

**Response:** We are continuing to explore ways to make the project as site specific as possible, while allowing flexibility for changing conditions. For example, Emphasis Areas, could be mapped in advance to narrow the scope of activities that could be authorized in a particular area. Design features and Management Requirements (such as slope limitations, LOPs, RCA buffers, watershed area limitations, etc.) and adaptive management triggers could further bound the scope of activities so that the effects would be bound within the scope of effects analyzed and disclosed.